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July 18, 2016

Ms. Jean Brochi
U.S. Environmental Protection Agency, New England Regional Office
5 Post Office Square, Suite 100, Mail Code: OEP06-1
Boston, MA 02109-3912

Re: Comments on Proposed Rule and Supplemental Environmental Impact Statement for Designation of a Dredged Material Disposal Site(s) in the Eastern Region of Long Island Sound; Connecticut

Dear Ms. Brochi:

Thank you for the opportunity for the Connecticut Department of Energy and Environmental Protection (DEEP) to review and provide agency comments on the U.S. Environmental Protection Agency (EPA) Proposed Rule and Supplemental Environmental Impact Statement (SEIS) for Designation of a Dredged Material Disposal Site(s) in Eastern Region of Long Island Sound; Connecticut. The Environmental Protection Agency (EPA) proposes to designate a dredged material disposal site, the Eastern Long Island Sound Disposal Site (ELDS) offshore from New London, Connecticut, for the disposal of dredged material from Connecticut and New York harbors and navigation channels in eastern Long Island Sound. EPA also invites comments on the desirability or preference for designating the Cornfield Shoals and/or Niantic Bay alternatives as well or in lieu of the ELDS.

The EPA determined that an open water disposal site is necessary in eastern Long Island Sound because there are no disposal sites currently designated for long-term use, dredged sediment management needs exceed the current available capacity of alternative management options, and EPA regulations require designation for any long-term dredged material disposal. The SEIS documented the existing physical, chemical, environmental, and socioeconomic conditions of the three final alternatives and evaluated them against the listed factors in the relevant federal regulations and selected the ELDS alternative as the preferred site.

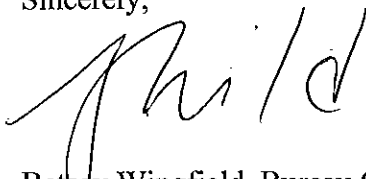
We support the EPA recommendation to designate ELDS and agree it is the best choice. However, we believe the Niantic Bay alternative in combination with the ELDS, is a viable option if adequate management practices are in place at the Niantic site to ensure appropriate containment of dredged materials while maintaining comparable overall disposal capacity. Providing adequate eastern Long Island Sound open water disposal capacity is vital for serving the dredging needs in the region, as the increased cost of transporting dredged sediment to the Central Long Island Sound Disposal site is excessive and will result in undue financial burden to Connecticut businesses and possibly deferral or outright elimination of projects. An

eastern Long Island Sound open water disposal site is vital for serving the dredging needs in the region, as the increased cost of transporting dredged sediment to the Central Long Island Sound Disposal site is excessive and will result in undue financial burden to Connecticut businesses and possibly deferral or outright elimination of projects.

Connecticut is committed to working with our state and federal partners to develop practicable alternatives to the open water disposal of dredged sediments. However, it is important that all parties recognize that considerable time and financial resources will be required to implement those alternatives and we must be realistic in our expectations. Reductions in open water disposal will be achieved, however it is likely they will take place incrementally over a long time horizon. During this time, it is essential that open water disposal sites in Long Island Sound, including an eastern site, remain available as environmentally sound and cost-effective options for numerous water-dependent uses in New York and Connecticut. We encourage EPA to adopt a rule that preserves the ability to maintain Connecticut's ports and waterways while taking into account the concerns of other federal and state agencies working to increase practicable beneficial uses of dredged sediments. Connecticut also seeks to work cooperatively with our state and federal partners to develop innovative and practicable funding mechanisms to implement beneficial uses while remaining cognizant of agencies' statutory requirements

We look forward to continued cooperation and progress with the state and federal agencies in addressing dredged sediment management in Long Island Sound. Thank you.

Sincerely,



Betsy Wingfield, Bureau Chief
Bureau of Water Protection and Land Reuse

cc:

Michael Sullivan, DEEP

Sandi Allen, NY DOS

William Scully, ACOE

Joe Salvatore, Connecticut Port Authority